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Attorneys for Defendant

**UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA**

**LINDA HELM, INDIVIDUALLY AND
ON BEHALF OF ALL OTHERS
SIMILARLY SITUATED,**

Plaintiff,

v.

THE MSR GROUP, LLC,

Defendant.

) Case No. 3:13-cv-03473-EMC

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) **STIPULATION TO CONTINUE CASE
MANAGEMENT CONFERENCE**

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COMES NOW, Plaintiff, LINDA HELM ("Plaintiff"), and Defendant, THE MSR GROUP, LLC ("Defendant"), by and through the undersigned counsel and hereby stipulate to continue the Case Management Conference currently scheduled for February 20, 2014.

GOOD CAUSE now exists for continuing the Case Management Conference, as follows:

- a) On December 13, 2013, Defendant filed its Answer to Plaintiff's Complaint.

- 1 b) On February 13, 2014, the parties submitted the Joint Case Management Statement
2 as required by this Court in preparation for the February 20, 2014 Case Management
3 Conference.
- 4 c) During this time, the parties, through counsel, have been actively engaged in
5 discussions surrounding the facts, claims and defenses asserted in this matter.
- 6 d) Furthermore, the parties, through counsel, have been actively engaged in
7 discussions regarding potential early resolution of the instant matter in an effort to
8 avoid substantial litigation.
- 9 e) The parties believe that good cause exists to continue the Case Management
10 Conference seven (7) days (or a date as soon thereafter as is convenient to the
11 Court) to allow the parties to continue the aforementioned discussions as the parties
12 may be able to reach a resolution absent incurring further litigation fees and costs.
- 13 f) This stipulation is submitted in good faith and not for the purposes of delay.
- 14 g) No party will be prejudiced by the requested continuance.
- 15

16
17 IT IS SO STIPULATED.

18
19 Respectfully submitted this 19th day of February 2014

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21 By: s/Todd M. Friedman
22 **TODD M. FRIEDMAN**
23 **Attorney for Plaintiff**

24
25 Respectfully submitted this 19th day of February 2014

26 By: s/Robert B. Bader
27 **ROBERT B. BADER**
28 **Attorney for Defendant**

ECF CERTIFICATION

Pursuant to General Order No. 45, § X.B., the filing attorney attests that he has obtained concurrence regarding the filing of this document from the signatories to the document.

Dated: February 19, 2014

By: /s/ Todd M. Friedman
TODD M. FRIEDMAN
Attorney for Plaintiff

PROOF OF SERVICE

I, Todd M. Friedman, state the following:

I am employed in Los Angeles, California; I am over the age of 18 and am not a party to this action; my business address is 369 S. Doheny Dr., Ste. 415, Beverly Hills, CA 90211. On February 19, 2014, I served the following documents:

STIPULATION TO CONTINUE CASE MANAGEMENT CONFERENCE

On the parties listed below:

GOODWIN PROCTER LLP

Robert B. Bader, Esq. (SBN: 233165)
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San Francisco, CA 94111
Telephone: (415) 733-6000
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Attorneys for Defendant

By the following means of service:

☒ **BY ELECTRONIC CASE FILING:** I filed the submitted the document listed above via the court's Electronic Case Filing (ECF) system which provides electronic mail (email) service of the listed document directly to the party listed above to his/her "email address of record."

☒ **STATE:** I declare under penalty of perjury under the laws of California that the above is true and correct.

Executed on February 19, 2014, at Beverly Hills, California.

By: /s/ Todd M. Friedman
Todd M. Friedman

UNITED STATES DISTRICT COURT
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LINDA HELM, INDIVIDUALLY AND
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)

) ~~[PROPOSED]~~ ORDER GRANTING
) STIPULATION TO CONTINUE CASE
) MANAGEMENT CONFERENCE

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UPON STIPULATION OF THE PARTIES AND GOOD CAUSE SHOWING, it is
hereby ORDERED that the February 20, 2014 Case Management Conference is continued to
February 27, 2014 at 9:00 am.

IT IS SO ORDERED.

2/19/14

Date: _____

By: _____
Hon. United States District Court Judge

